

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

THEODORE J. FOLKMAN,

Plaintiff,

vs.

US DEPARTMENT OF STATE,

Defendant

Civ. A. No. 13-10614-RWZ

**DECLARATION OF THEODORE J. FOLKMAN**

I, Theodore J. Folkman, make the following declaration.

1. Attached to this Declaration as exhibit 1 is a true copy of a letter I received from the defendant dated March 7, 2014.
2. Attached to this Declaration as exhibit 2 is a true copy of a letter I sent to counsel for the defendant dated December 16, 2013.
3. Attached to this Declaration as exhibit 3 is a true copy of an email I received from counsel for the defendant dated March 6, 2014.
4. Attached to this Declaration as exhibit 4 is a true copy of a request under the Freedom of Information Act I submitted to the State Department on April 25, 2014.
5. To date, I have not received a response to my April 25, 2014 FOIA request from the defendant indicating whether the defendant intends to produce public records responsive to the request, and if so, when.
6. Attached to this Declaration as exhibit 5 is a true copy of a letter I received from the defendant dated May 7, 2014.

7. Attached to this Declaration as exhibit 6 is a true copy of a letter I sent to the defendant dated May 15, 2014.

8. Attached to this Declaration as exhibit 7 is a true copy of a letter I received from the defendant dated June 17, 2014.

9. Attached to this Declaration as exhibit 8 is a true copy of a letter I received from the defendant dated July 9, 2014.

I declare that the foregoing is true and correct. Executed under penalty of perjury this sixteenth day of July, 2014.

/s/ Theodore J. Folkman

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants on July 16, 2014.

/s/ Theodore J. Folkman

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